

United States District Court  
Southern District of Texas  
AO 91 (Rev. 10/09) Criminal Complaint  
FILED

SEP 17 2020

## UNITED STATES DISTRICT COURT

David J. Bradley, Clerk

for the  
Southern District of Texas

United States of America

v.

Jennifer MALDONADO

DOB: 1997 Citizenship: United States

*Defendant(s)*

Case No.

M-20-1873-M

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 16, 2020 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

*Code Section**Offense Description*

21 U.S.C. § 841(a)(1)

Possession With Intent to Distribute a Controlled Substance/Approximately  
13.24 Kilograms of Methamphetamine, a Schedule II Controlled Substance.

21 U.S.C. § 952

Illegal Importation of a Controlled Substance/Approximately/Approximately  
13.24 Kilograms of Methamphetamine, a Schedule II Controlled Substance.

This criminal complaint is based on these facts:

SEE ATTACHMENT "A"

Submitted by reliable electronic means, sworn to and attested to telephonically per Fed. R. Cr. P. 4.1,  
and probable cause found on:

✓ Continued on the attached sheet.

/s/ Jesus Palomo

*Complainant's signature*

Jesus Palomo HSI Special Agent

*Printed name and title*

Approved by AUSA Matthew Redavid

Date:

9/17/2020 05:08 PM*Judge's signature*City and state: McAllen, Texas

J. Scott Hacker, US Magistrate Judge

*Printed name and title*

**Attachment A**

1. The purpose of this affidavit is in support of a complaint to arrest Jennifer Maldonado, a United States Citizen, for violations of 21 USC 841(a)(1) (Possession with intent to Distribute a Controlled Substance) and 21 USC 952 (Illegal Importation of Controlled Substance). The information in this affidavit is based on personal knowledge and information provided to me by other law enforcement officers and individuals. The information in this affidavit is provided for the limited purpose of establishing probable cause. The information is not a complete statement of all the facts related to this case.
2. On September 16, 2020, Homeland Security Investigations in McAllen, Texas, (HSI McAllen) received a request for investigative assistance from the U.S. Customs and Border Protection (CBP) Office of Field Operations at the Anzalduas Port of Entry (POE) in Mission, Texas. At 9:23 am, CBP Officers (CBPOs) detained Jennifer MALDONADO (hereafter MALDONADO), a citizen of the United States, while attempting to enter the U.S. with approximately 13.24 kilograms of methamphetamine concealed within the center console of the vehicle she was driving. MALDONADO entered the United States through the Anzalduas, Texas Port of Entry operating a maroon in color Pacifica van with Texas License plate #BW4X982. The vehicle was registered to Jennifer MALDONADO.
3. At the Anzalduas Port of Entry, Customs and Border Protection Officers (CBPO) referred MALDONADO to a secondary inspection due to a TECS hit for not declaring over \$10,000.00 that were found concealed on her body during a previous inspection.
4. During the secondary inspection, CBP officers conducted a Non-Intrusive inspection using the Z-Portal. CBP officers analyzed the scan and discovered anomalies within the vehicle's center console.
5. A physical search was conducted. During the search, a CBP officer disassembled the center console and found a hidden compartment in the center console. Twenty-one shrink wrapped packages containing a white crystalline powder were extracted from the hidden compartment. A GEMINI tool was used to test the crystalline substance that tested positive for methamphetamine. The total weight of the packages resulted in a weight of 13.24 kgs.
6. Homeland Security Investigations (HSI) Special Agent (SA) Palomo responded to the Anzalduas POE to assist in the investigation. SA Palomo advised MALDONADO of her Miranda warning in Spanish. MALDONADO waived her rights in writing and spoke to SA Palomo. HSI Special Agents interviewed MALDONADO, who stated that she knowingly transported what she believed to be "cocaine" hidden in her vehicle. MALDONADO admitted that she was transporting the contraband into the United States to pay off a debt that she owed in Mexico. MALDONADO admitted that she new that

there was a possibility that she would be caught but agreed to transport the contraband because she believed she had no other options of paying off the debt in Mexico.

MALDONADO admitted that once she crossed the contraband into the United States, she would receive a call on her phone and be given directions to a location where she would drop off the vehicle so someone else could pick it up and have it unloaded.